

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

REX VENTURE GROUP, LLC  
d/b/a ZEEKREWARDS.COM, and  
PAUL BURKS,

Defendants.

Civil Action No. 3:12 cv 519

**RECEIVER'S REQUEST FOR LEAVE TO INSTITUTE ACTIONS AGAINST  
INTERNATIONAL NET WINNERS**

On August 17, 2012, this Court entered an Agreed Order appointing Kenneth D. Bell as a Receiver to investigate, pursue and recover all potential claims and other assets of the Rex Venture Group, LLC ("RVG") receivership estate. Pursuant to paragraph 43 of that Agreed Order, the Receiver requests leave of this Court to institute actions for the benefit and on behalf of the Receivership Estate against certain scheme participants who reside outside the United States and were "net winners" in ZeekRewards.

Since his appointment, the Receiver has thoroughly investigated RVG and the ZeekRewards scheme. After careful analysis of RVG's written and electronic records, review of hundreds of thousands of documents and numerous interviews with relevant witnesses, the Receiver has concluded that the scheme's significant "net winners" should

be required to disgorge their profits (which came from the scheme's victims) and return the money fraudulently transferred to them so that it can be repaid to victims.

The Receiver has previously filed actions against the insiders who created and operated ZeekRewards, the net winners who won more than \$1000 (asserting claims against the largest net winners as individual defendants / class representatives and a defendant class of the remaining net winners) and certain attorneys involved in advising RVG and promoting the scheme. By this request, the Receiver seeks leave to file one or more actions in this Court and in foreign courts to pursue claims for the return of fraudulently transferred money and disgorgement of net funds received against significant "net winners" who reside outside the United States. The foreign "net winners" to be pursued all won at least \$1000, the threshold previously approved by this Court. With due regard for the interests of efficiency, cost and judicial economy, the Receiver intends to consolidate cases against net winners from each foreign country and from more than one country when possible and appropriate.

In accordance with the Agreed Order, the Receiver has provided prior notice to Counsel for the Securities and Exchange Commission.

Thus, the Receiver respectfully requests leave to institute the actions described above.

Respectfully submitted this 15th day of August, 2014.

By: /s/ Irving M. Brenner  
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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have electronically filed the foregoing using the CM/ECF system which will send notification to the following parties:

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*Attorneys for the Defendants*

This the 15th day of August, 2014.

/s/ Irving M. Brenner